



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 21 2003

REPLY TO THE ATTENTION OF:

B-19J

Joel Skjerven, District Ranger
Lakewood/Laona Ranger District.
McCaslin Project
15085 State Road 32
Lakewood, Wisconsin 54138

Re: Comments on the DEIS for the McCaslin Project, Lakewood/Laona Ranger District,
Chequamegon-Nicolet National Forest, Oconto and Forest Counties, Wisconsin - EIS No.
030076

Dear Mr. Skjerven:

In accordance with the U.S. Environmental Protection Agency's (U.S. EPA's) responsibilities under both the National Environmental Policy Act and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) submitted by the U.S. Forest Service (USFS) for the McCaslin Project, a proposal to implement vegetation management activities that are consistent with the direction in the Chequamegon-Nicolet Forest Plan. According to the DEIS, the McCaslin Project will achieve the following objectives:

1. forest age and composition modification,
2. stand tending and reforestation,
3. access management,
4. erosion control at Lincoln Lake and the north branch of the Oconto River,
5. fish and wildlife habitat maintenance and improvement, and
6. archaeological evaluation and interpretation.

The DEIS evaluates five different management alternatives:

1. No Action. Current management plans would continue in the project area under the no-action alternative.
2. Proposed Action. This alternative is designed to change the project area's characteristics towards desired conditions in the Chequamegon-Nicolet National Forest Plan. The proposed action includes activities to improve fish and wildlife habitat and to increase public knowledge of heritage resources.
3. Interior Habitat. This alternative is designed to meet the purpose and need of the project,

while causing less fragmentation in the project area. There would be less road construction and no wildlife opening maintenance under this alternative. The interior habitat alternative would favor longer-lived tree species. Design features that reduce impacts to interior habitat, such as winter logging, would be increased.

4. Aspen Emphasis. This alternative is designed to meet the purpose and need of the project while maintaining and enhancing aspen and other young forest types within the project area. Aspen stands at rotation age would be widely regenerated under this alternative. Stands with an aspen component would be converted to aspen, in order to counter the loss of aspen through succession. Existing wildlife openings would be maintained, and prescribed underburns would be included to maintain or enhance young forest conditions.
5. Hybrid Alternative. This alternative was developed to address the issues in the interior habitat and the aspen emphasis alternatives. The soil types within the project area support different types of trees, depending on location. The northern half of the project area supports northern hardwoods in large blocks, and the southern half supports a larger variety of forest types in smaller patches. Therefore, the hybrid alternative is designed to maintain or enhance the large block northern hardwood types in the northern part of the project area, and maintain or enhance the aspen or young forest types in the southern part. Also, the hybrid alternative includes other vegetation and road management activities that would be consistent with the general theme of the alternative.

After reviewing the DEIS, we have the following comments and recommendations:

Fragmentation

We are concerned about forest fragmentation caused by the proposed action, since the proposed action appears to increase fragmentation over most of the other alternatives. According to the DEIS, the proposed action implements the highest road reconstruction miles, the second highest road construction miles, the lowest road closure miles, and the lowest road deconstruction miles (when compared to the other four alternatives). Under this scenario, the proposed action would cause the largest increase in miles of edge (1.7%), the second largest decrease in interior acres (9.7%), and the second largest increase in edge-affected acres (9.44%). The DEIS states that forest fragmentation causes negative impacts on neotropical migratory birds. These impacts include habitat discontinuity, parasitism, predation, area sensitivity, patch isolation and habitat isolation.

We are also concerned about the cumulative impact of forest fragmentation. According to the DEIS, "Private lands would likely continue to be fragmented as large parcels are broken into smaller lots for rural home development and associated road construction." The combined forest fragmentation activities from the proposed action and private development projects would have a cumulative impact on wildlife habitat in northern Wisconsin. For the final environmental impact statement (FEIS), USFS should consider implementing an alternative other than the proposed action in order to reduce the direct and cumulative forest fragmentation impacts from the

proposed action. The no-action alternative and the interior habitat alternative appear to be the environmentally preferable alternatives for this case, since each alternative would not significantly change the current landscape pattern. Alternatively, USFS may consider developing mitigation activities for fragmentation impacts in its proposed action.

Future Programmatic Guidelines

We are concerned because certain vegetation management activities in the proposed action may conflict with management goals in future programmatic guidelines. Specifically, the proposed action includes about 260 acres of openings. This activity would not be consistent with northern hardwood management goals listed in seven alternatives of the upcoming Chequamegon-Nicolet Forest Plan Revision (Forest Plan Revision). If USFS chooses to implement the proposed action and one of the seven alternatives in the Forest Plan Revision, then USFS would be acting against its own long-term goals for the Chequamegon-Nicolet Forest. It would be prudent for USFS to ensure that its short- and long-term goals reflect a consistent and unified strategy. Therefore, USFS should consider implementing an alternative with goals that are consistent with the long-term goals in the Forest Plan Revision, or it should reconcile the significant differences in goals between the proposed action and the Forest Plan Revision Alternatives.

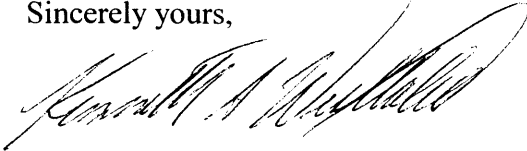
Golden-Winged Warbler

We are concerned about the proposed action's impact on the Golden-Winged Warbler. According to the DEIS, the proposed action would reduce this warbler's population by 78.8 percent, due to the harvest of aspen stands that currently have high population densities. The DEIS lists the Golden-Winged Warbler as a management indicator species. The DEIS defines a management indicator species as "a wildlife species whose population will indicate the health of the ecosystem in which it lives and, consequently, the effects of forest management activities to that ecosystem." This would indicate that aspen ecosystem health associated with the Golden-Winged Warbler would greatly decrease under the proposed action.

On April 18, 2003, Scott Anderson of USFS spoke with Newton Ellens of my staff. Mr. Anderson stated that the data showing a 78.8 percent decline in the Golden-Winged Warbler's population under the proposed action is incorrect. Mr. Anderson stated that the warbler's population would actually decline 3 percent, which is more acceptable to our agency. USFS should correct this discrepancy in the FEIS.

In summary, U.S. EPA has identified issues relating to impacts to forest fragmentation, conflict with future programmatic guidelines, and the Golden-Winged Warbler. Based upon our review of this project and its DEIS, we have assigned a rating of "EC-2" (environmental concerns, insufficient information). Please refer to the enclosed Summary of Rating Definitions Sheet. This rating will be published in the Federal Register. If you have any questions or comments, please feel free to contact Newton Ellens of my staff at (312) 353-5562.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written in a cursive style.

Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosure

SUMMARY OF RATING DEFINITIONS AND FOLLOWUP ACTIONS*

ENVIRONMENTAL IMPACT OF THE ACTION

LO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

**From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.*